

JOSE MARTINEZ - JULY 26, 2022

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1 A Yes.

2 Q And what are the names of the lawyers that  
3 Hyphy has retained?

4 A Anthony Lopez, George Preheim (phonetic).

5 Q And Mr. Lopez and Mr. Preheim that you just  
6 referred to are also Hyphy's counsel in this action,  
7 correct?

8 A Correct.

9 Q And clearly you believe Mr. Lopez and Mr.  
10 Preheim to be capable counsel?

11 MR. BEGAKIS: Objection. Irrelevant,  
12 outside the scope of this deposition, and I'm  
13 instructing the witness to only respond to the extent  
14 that he can respond without divulging any attorney-  
15 client privilege information.

16 MR. BERMAN: Okay. That was an opinion -  
17 - question regarding an opinion, and over your clients -  
18 -

19 MR. BEGAKIS: To the extent that that  
20 opinion reflects confidential attorney-client privileged  
21 information, the client is not to respond.

22 MR. BERMAN: Over that speaking  
23 objection, Mr. Martinez, you can answer.

24 MR. BEGAKIS: If he's capable of it.

25 THE WITNESS: Yeah. I -- I can't say



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1 whether or not they're good attorneys.

2 BY MR. BERMAN:

3 Q When did you first retain Mr. Lopez to  
4 represent Hyphy in any capacity?

5 MR. BEGAKIS: Objection. Outside of the  
6 scope of this deposition. I'm instructing the witness  
7 not to answer.

8 MR. BERMAN: John, it's way too early to  
9 be getting into this. Over your client's --

10 MR. BEGAKIS: It's inappropriate -- it's  
11 inappropriate to be asking questions about when my  
12 client retained his legal counsel. He's not answering  
13 that question. I'm objecting on the basis that it  
14 potentially is disclosing attorney-client privileged  
15 information. It is outside of the scope of this  
16 deposition unless counsel wants to point me to the  
17 category of questioning in which this information is  
18 relevant. And the clients not -- the witness is not  
19 going to answer.

20 MR. BERMAN: As you're aware, unless you  
21 -- unless I'm asking for the substance of a conversation  
22 or communication between client and attorney, dates of  
23 retaining, fees paid, are not subject to privilege --

24 MR. BEGAKIS: That is -- that is not my  
25 understanding of the law with respect to attorney-client



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